

EXHIBIT A

From: [David J. Stanoch](#)
To: [Lockard, Victoria D. \(Shld-Atl-LT\)](#); [Conlee Whiteley](#)
Cc: [Harkins, Steven M. \(Assoc-ATL-LT\)](#)
Subject: RE: Teva Witness Deposition Scheduling - tentative proposed dates
Date: Wednesday, February 10, 2021 12:30:54 PM

EXTERNAL TO GT

Victoria,

Further to our ongoing meet and confers, as you know Plaintiffs seek a “cast of characters” from each Defendant in connection with their privilege logs. A subset of that relates to the legal personnel identified in each Defendant’s privilege log. We believe you suggested Teva would produce an updated “legend” that contains the name, email address, job title, and department for all lawyers or paralegals on Teva’s privilege log. We understand Mylan has agreed to this. While Plaintiffs maintain they need the full “cast of characters” to properly assert privilege log challenges, the updated attorney/paralegal legend we believe should be low-hanging fruit that will materially advance the privilege log challenge process. When do you expect to be able to produce this?

Separately, please share any updates on the deposition scheduling, and whether Teva is on track to complete its TAR re-review production by next week.

Regards,
Dave

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